

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Team Zenith Platinum Status Inc;  
Bernard T. Anderson Bey (C.E.O.)  
Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been assigned)

-against-

**COMPLAINT**

Rocnation LLC; Sean C. Carter;  
Corporate Creations Network Inc;  
Live Nation Entertainment Inc.

Do you want a jury trial?  
☐ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.



## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

The Sherman Antitrust Act 15 U.S.C § 1-7

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Bernard T. Anderson Bey, is a citizen of the State of  
(Plaintiff's name)

New York

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.



If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, Rocnation LLC, is incorporated under the laws of the State of Delaware

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Bernard T Anderson Bey  
First Name Middle Initial Last Name

35 Dwight Street Apt 6B  
Street Address

Brooklyn NY 11231  
County, City State Zip Code

(718) 930-0021  
Telephone Number

bernardandersonbey@gmail.com  
Email Address (if available)



**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Rocnation LLC

First Name

Last Name

Current Job Title (or other identifying information)

Agent 3411 Silverside Road Tatnall Suite 104

Current Work Address (or other address where defendant may be served)

Wilmington, New Castle DE 19810

County, City

State

Zip Code

Defendant 2:

Corporate Creations Network Inc

First Name

Last Name

Agent

Current Job Title (or other identifying information)

3411 Silverside Road Tatnall Building Ste 104

Current Work Address (or other address where defendant may be served)

Wilmington New Castle DE 19810

County, City

State

Zip Code

Defendant 3:

Sean C. Carter

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code



Defendant 4: Live Nation Entertainment Inc  
First Name Last Name  
Corporation  
Current Job Title (or other identifying information)  
Agent: 34111 Silverside Road Tatnall Bldg Ste 104  
Current Work Address (or other address where defendant may be served)  
Wilmington New Castle DE 19810  
County, City State Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: New York ; Florida

Date(s) of occurrence: Approximately 2007 - Present

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Defendants Rocnation LLC in affiliation with Sean C. Carter (Jay-Z); Corporate Creations LLC and Live Nation Entertainment Inc via contract and or for value and equal benefit. Exercising superior market share over the hip hop recording industry in the production of master recordings; Streaming merchandise and touring for Sean C. Carter and other affiliated artist under contract with Roc Nation LLC with superior finances and influence over key promotional services and industry personnel as a monopoly approximately between the years of 2007 to the present have deliberately suppressed Team Zenith Platinum Status Inc brand and that of their affiliated artist from



generation of substantial revenue through interstate commerce and touring by suppression of revenue generation, in cryptocurrency investments, banking, deterring the securement of master recording copyrights as well as deterring the securement of individual income of C.E.O. Bernard T. Anderson Bey such as tax refunds and stimulus payments, etc.. The suppression of marketing tools such as Yo Raps Magazine, Facebook advertising Youtube advertising by utilizing their influence and resources to block Team Zenith Platinum Status Inc marketing and

#### INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

The plaintiff's have suffered significant loss of revenue and damages.

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Compensatory and punitive damages and any other relief the Court deems just and appropriate.



## Facts: Continued; Page 2

promotional campaigns. Sabotage of performance events, marketing, promotion and touring revenue by utilizing their influence to negatively affect staff and artist participation at said events.

Sabotage of social media accounts.

Hacking of phone and laptop software for recording of masters.

Further the defendants have negatively influenced law enforcement; court officials and employees in the initiation of unwarranted investigations, attempted false charges by law enforcement as well as negative influence over family and personal relationships to discredit plaintiff's brand.

Defendants further suppressed company artist brand growth where Rocnation affiliated artist sought to dissolve contracts with Team Zenith Platinum Status Inc artist suggesting the contracts



### Facts: Continued; Page 3

where slave contracts and further dissuaded Team Zenith Platinum Status Inc artist from company loyalty and productivity.

As the C.E.O. of Team Zenith Platinum Status Inc learning and growing from the examples set by Sean C. Carter and Rocnation executives and owners as well as countless others within the recording industry such as Clive Davis and Sean Combs, James Lovine and Andre Young, Quincy Jones Andre Harrell etc, I sought out to create my own company. Being 26 when I initially started producing master recordings, based on prior examples, I knew maintaining creative control and building value behind our product and brand via direct sales investing in the markets of stock and currency and reinvesting said profits in marketing and promotion would be the only way to succeed.



Facts: Continued; Page 4

I have the utmost respect for Sean C. Carter (Jay-Z) and Rocnation LLC brand and I have sought endlessly to merge and or co exist with Rocnation LLC and have been met with fierce opposition to annihilate Team Zenith Platinum Status Inc, company and artist brand. Team Zenith Platinum Status Inc can stand on its own if fairly allowed to compete in the market but with Rocnation LLC's superior market position and resources building our brand and value and offering up seemed the only solid solution to avoid the unnecessary quarrel.



**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

April 14<sup>th</sup> 2021  
 Dated

Bernard J. Anderson Bey  
 Plaintiff's Signature

Bernard T Anderson Bey  
 First Name Middle Initial Last Name

35 Dwight Street Apt 6B  
 Street Address

Brooklyn NY 11238  
 County, City State Zip Code

(718) 930-0021 bernardandersonbey@gmail.com  
 Telephone Number Email Address (if available)

I have ☒ read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:  
☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.





**United States District Court  
Southern District of New York**

**Pro Se (Nonprisoner) Consent to Receive Documents Electronically**

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER<sup>1</sup> at [www.pacer.uscourts.gov](http://www.pacer.uscourts.gov) or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.<sup>2</sup> Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

**IMPORTANT NOTICE**

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.<sup>3</sup>

<sup>1</sup> Public Access to Court Electronic Records (PACER) ([www.pacer.uscourts.gov](http://www.pacer.uscourts.gov)) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

<sup>2</sup> You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

<sup>3</sup> The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

500 PEARL STREET | NEW YORK, NY 10007  
300 QUARROPAS STREET | WHITE PLAINS, NY 10601

PRO SE INTAKE UNIT: 212-805-0175



### CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

**Civil case(s) filed in the Southern District of New York:**

**Note:** This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

\_\_\_\_\_  
\_\_\_\_\_  
Anderson Bey Bernard T

Name (Last, First, MI)

35 Dwight Street Brooklyn NY 11238 Apt 6B

Address

City

State

Zip Code

(718) 930-0021

Telephone Number

bernardandersonbey@gmail.com

E-mail Address

April 14<sup>th</sup> 2021

Date

Bernard T Anderson Bey

Signature

**Return completed form to:**

Pro Se Intake Unit (Room 200)  
500 Pearl Street  
New York, NY 10007



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Team Zenith Platinum Status Inc

Bernard T. Anderson Bey C.E.O.

(full name of the plaintiff or petitioner applying (each person must submit a separate application))

-against-

CV

( ) ( )

(Provide docket number, if available; if filing this with your complaint, you will not yet have a docket number.)

Rocnation LLC; Sean C. Carter

Corporate Creations Network Inc; Live Nation Entertainment Inc.  
(full name(s) of the defendant(s)/respondent(s))

APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS

I am a plaintiff/petitioner in this case and declare that I am unable to pay the costs of these proceedings and I believe that I am entitled to the relief requested in this action. In support of this application to proceed *in forma pauperis* (IFP) (without prepaying fees or costs), I declare that the responses below are true:

1. Are you incarcerated? ☐ Yes ☒ No (If "No," go to Question 2.)

I am being held at: \_\_\_\_\_

Do you receive any payment from this institution? ☐ Yes ☒ No N/A

Monthly amount: \_\_\_\_\_

If I am a prisoner, see 28 U.S.C. § 1915(h), I have attached to this document a "Prisoner Authorization" directing the facility where I am incarcerated to deduct the filing fee from my account in installments and to send to the Court certified copies of my account statements for the past six months. See 28 U.S.C. § 1915(a)(2), (b). I understand that this means that I will be required to pay the full filing fee.

2. Are you presently employed? ☒ Yes ☐ No

If "yes," my employer's name and address are: Team Zenith Platinum Status Inc.

Gross monthly pay or wages: \$ 400 Monthly

If "no," what was your last date of employment? \_\_\_\_\_

Gross monthly wages at the time: \_\_\_\_\_

3. In addition to your income stated above (which you should not repeat here), have you or anyone else living at the same residence as you received more than \$200 in the past 12 months from any of the following sources? Check all that apply.

- (a) Business, profession, or other self-employment  
(b) Rent payments, interest, or dividends

☐ Yes  
☐ Yes

☒ No  
☒ No



- |   |   |  |
|---|---|--|
| (c) Pension, annuity, or life insurance payments  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (d) Disability or worker's compensation payments  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (e) Gifts or inheritances   | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (f) Any other public benefits (unemployment, social security, food stamps, veteran's, etc.) | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| (g) Any other sources   | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

Public Assistance Grant \$ 140 Monthly

If you answered "No" to all of the questions above, explain how you are paying your expenses:

4. How much money do you have in cash or in a checking, savings, or inmate account?

Checking Account \$ 1.03

5. Do you own any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value, including any item of value held in someone else's name? If so, describe the property and its approximate value:

N/A

6. Do you have any housing, transportation, utilities, or loan payments, or other regular monthly expenses? If so, describe and provide the amount of the monthly expense:

Student Loans (Currently in deferment)  
Child Support \$ 200 Monthly.

7. List all people who are dependent on you for support, your relationship with each person, and how much you contribute to their support (only provide initials for minors under 18):

S. A. B. Daughter \$ 200 Monthly

J. F. J. Daughter Retains Physical Custody and legal guardianship

8. Do you have any debts or financial obligations not described above? If so, describe the amounts owed and to whom they are payable:

**Declaration:** I declare under penalty of perjury that the above information is true. I understand that a false statement may result in a dismissal of my claims.

April 14th 2021  
Dated

Bernard T Anderson Bey  
Signature

Anderson Bey Bernard T.  
Name (Last, First, MI)

N/A  
Prison Identification # (if incarcerated)

35 Dwight Street Brooklyn NY  
Address City State

11238  
Zip Code

(718) 930-0021  
Telephone Number

bernardandersonbey@gmail.com  
E-mail Address (if available)



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Team Zenith Platinum Status Inc;  
Bernard T. Anderson Bey (C.E.O.)  
(List the full name(s) of the plaintiff(s)/petitioner(s).)

\_\_\_\_ CV \_\_\_\_ (\_\_\_\_) (\_\_\_\_)

-against-

Application for the Court to  
Request Pro Bono Counsel

Rocnation LLC; Sean C. Carter;  
Corporate Creations Network Inc; Live Nation Entertainment LLC  
(List the full name(s) of the defendant(s)/respondent(s).)

I ask the Court to request a *pro bono* attorney to represent me in this action. In support of my application, I declare under penalty of perjury that the following information is true and correct:

1. Have you previously filed a "Request to Proceed in Forma Pauperis" (an IFP application)?

Please check the appropriate box below:



I have previously filed an IFP application in this case, and it is a true and correct representation of my current financial status.



I have not previously filed an IFP application in this case and now attach an original IFP application showing my financial status.



I have previously filed an IFP application in this case, but my financial status has changed. I have attached a new IFP application showing my current financial status.

2. Explain why you need an attorney in this case. (Please note that requests for *pro bono* counsel are rarely granted at the early stages of a case and usually not before the Court has issued a decision on the merits of the case.) If you asked for an attorney earlier in this case, please also explain what has changed since you last asked for an attorney.

I am requesting an attorney because based  
on the nature of my claim a corporation  
can not be represented except by a lawyer  
and while I also file the claim in my  
individual capacity as primary stockholder in  
said corporation I do not possess the experience  
to adjudicate this claim efficiently.



3. Explain what steps you have taken to find an attorney and with what results. (Please identify the lawyers, law firms or legal clinics you have contacted and their responses to your requests. If you have limited access to the telephone, mail, or other communication methods, or if you otherwise have had difficulty contacting attorneys, please explain.)

I am seeking assistances directly from the court.

4. If you need an attorney who speaks a language other than English, state what language(s) you speak: \_\_\_\_\_
5. I understand that if an attorney volunteers to represent me and that attorney learns that I can afford to pay for an attorney, the attorney may give this information to the Court.
6. I understand that even if the Court grants this application, I will receive *pro bono* counsel only if an attorney volunteers to take my case and that there is no guarantee that an attorney will volunteer to represent me.
7. I understand that if my answers on this application or in my IFP application are false, my case may be dismissed.

April 14<sup>th</sup> 2021

Date

Bernard T Anderson Bey

Signature

Anderson Bey Bernard T

Name (Last, First, MI)

Prison Identification # (if incarcerated)

35 Dwight Street Brooklyn

Address

City

NY

State

11238

Zip Code

(718) 930-0021

Telephone Number

bernardandersonbey@gmail.com

E-mail Address (if available)